

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN M. NOLAN, JR.,	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
v.	:	
	:	
READING BLUE MOUNTAIN & NORTHERN RAILROAD COMPANY,	:	
	:	
Defendant.	:	NO. 02-CV-2805 (PBT)

PLAINTIFF'S PRETRIAL MEMORANDUM

1. A brief statement of the nature of the action and the basis on which the jurisdiction of the Court is invoked. **See Schedule (1) attached.**

2. Plaintiff's brief statement of the facts of the case omitting pejorative characterizations, hyperbole, and conclusory generalizations. **See Schedule (2) attached.**

3. A list of every item of monetary damages claimed, including (as appropriate) computations of lost earnings and loss of future earning capacity, medical expenses (itemized), property damages, etc. If relief other than monetary damages is sought, information adequate for framing an order granting the relief sought shall be furnished. **See Schedule (3) attached.**

4. A list showing the names and addresses of all witnesses the party submitting the memorandum intends to call at trial. Liability and damages witnesses shall be designated separately. **See Schedule (4) attached.**

5. A schedule of all exhibits to be offered at trial by the party submitting the memorandum. **See Schedule (5) attached.**
6. An estimate of the number of days required for trial.

Trial of this case is expected to take five (5) days, beginning on August 8, 2005.
7. Special comments regarding legal issues, stipulations, amendments of pleadings, or other appropriate matters. **See Schedule (7) attached.**

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